



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

(b) (6), (b) (7)(C)

DATE: March 19, 2014

PREPARED BY: SA (b) (6), (b) (7)(C)

CASE #: OI-CI-2013-CAC-2830

CROSS REFERENCE #:

TITLE: DETROIT DEPARTMENT OF HEALTH AND WELLNESS

CASE CLOSING REPORT

Subject(s)	Location	Other Data
DETROIT DEPARTMENT OF HEALTH AND WELLNESS, ET AL.	DETROIT, MICHIGAN	N/A

ALLEGATION: On June 22, 2011, Special Agent (b) (6), (b) (7)(C), United States Environmental Protection Agency (EPA), Office of Inspector General, Chicago, Illinois, received an investigative referral from (b) (6), (b) (7)(C) EPA Region 5, Chicago, Illinois. (b) (6), (b) (7)(C) expressed concern over an EPA grant, which was awarded to the Detroit Department of Health and Wellness (DDHW), Detroit, Michigan. (b) (6), (b) (7)(C) specifically identified the grant number as EPA-OPPT-06-19, which was further identified as the *Detroit Newborn Primary Prevention Project – Lead Awareness*. The grant was awarded on September 9, 2007, and a no-cost extension was granted on September 19, 2008, to allow DDWH to submit their final technical report. The monetary value of the grant was \$100,000.00. According to (b) (6), (b) (7)(C) the final report submitted by DDWH was deemed inadequate as a result of DDWH not addressing or following several required parameters. These included applicable work activities, outcomes, blood lead testing and training procedures, data collection, equipment purchases, and financial status reports.

FINDINGS: Interviews conducted during the investigation determined DDWH experienced problems with meeting some of the requirements prescribed by the EPA. On July 22, 2011, (b) (6), (b) (7)(C) EPA Region 5, was interviewed. (b) (6), (b) (7)(C) related DDWH was remiss in filing timely Financial Status Reports (FSRs) and responding to EPA inquiries regarding clarification of expenditures. On July 22, 2011, (b) (6), (b) (7)(C) EPA Region 5, related DDWH experienced several personnel changes during the performance period, which caused problems with reporting requirements. (b) (6), (b) (7)(C) indicated DDWH had problems following purchasing procedures and adhering to the Quality Assurance Program Plan and FSRs, but did not draw down more than the obligated amount allowed by the EPA. On August 5, 2011, (b) (6), (b) (7)(C) EPA Region 5, expressed similar concerns. However, (b) (6), (b) (7)(C) confirmed the final FSR was received by the EPA. Additional interviews of several personnel employed by DDWH and the City of Detroit revealed deficiencies related to grant administration and satisfactory completion of the statement of work, but

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did not disclose definitive evidence of criminal activity relating to the EPA grant awarded to the DDWH.

DISPOSITION: The timeframe of the grant award and subsequent period of performance now translates to statute of limitations concerns in the event criminal activity was disclosed. The investigation did not reveal any direct evidence of criminal activity relating to the EPA grant. Additionally, there is no specific information demonstrating the EPA was subject to a monetary loss as a result of the activities and responsibilities entrusted to DDWH as the grant recipient. During 2013, the EPA administratively closed the grant awarded to DDWH without adverse action. Based on the foregoing, there is no basis for pursuing criminal, civil, or administrative remedies in this matter. Therefore this case is closed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

DATE: MAY 8, 2015

PREPARED BY: SPECIAL (b) (6), (b) (7)(C)

CASE #: OI-CH-2015-CAC-0023

CROSS REFERENCE #:

TITLE: (b) (6), (b) (7)(C) IMPERSONATION OF EPA EMPLOYEE

CASE CLOSING REPORT

Subject(s)	Location	Other Data
(b) (6), (b) (7)(C)	CHICAGO, ILLINOIS	

VIOLATION(s):

18 U.S.C 641 (Theft of Government property) and 18 U.S.C 912 (Falsely impersonating a federal officer or employee).

ALLEGATION(s): On December 9, 2014, a former EPA employee, (b) (6), (b) (7)(C) entered the Department of Homeland Security (DHS), Customs Building, located at 620 S. Canal Street, Chicago, Illinois, using a government identification containing the word "Environment" listed on it. The original information was reported by a Federal Protective Service (FPS), Contractual Security Guard (CSG), who witnessed (b) (6), (b) (7)(C) entering the DHS Customs Building by using an alleged EPA identification to utilize the Federal Credit Union located inside the building. The FPS CSG later confirmed (b) (6), (b) (7)(C) was a terminated EPA employee. EPA OIG OI Chicago Office opened a joint investigation with FPS.

FINDINGS: During the investigation, a copy of the FPS Police Report was obtained and reviewed, which did not provide new information to support the alleged violations committed by (b) (6), (b) (7)(C). FPS declined to pursue charges against (b) (6), (b) (7)(C) and closed their respective investigation. (b) (6), (b) (7)(C) was interviewed by a Special Agents of the EPA OIG OI and EPA Criminal Investigative Division (CID). During (b) (6), (b) (7)(C) interview, (b) (6), (b) (7)(C) stated (b) (6), (b) (7)(C) provided a (b) (6), (b) (7)(C) identification to gain entry to the Customs Building on December 9, 2014. The (b) (6), (b) (7)(C) verified (b) (6), (b) (7)(C) had a valid and current (b) (6), (b) (7)(C) identification. The information was presented to the United States Attorney's Office who declined prosecution of the case. In December 2014, (b) (6), (b) (7)(C) had an EPA Special Order and a FPS Alert notice issued against (b) (6), (b) (7)(C) denying access to all EPA controlled space within all EPA buildings nationwide.

DISPOSITION: No additional substantive investigative leads were developed during this review and no other indications of impersonating a federal employee or theft of government property were presented during this review. Therefore, it is recommended this investigation be closed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS
1595 WYNKOOP STREET, 4th FLOOR
DENVER, CO 80202

DATE: SEPTEMBER 9, 2015

PREPARED BY: RAC (b) (6), (b) (7)(C)

CASE #: OI-DE-2015-CAC-0111

CROSS REFERENCE #: HOTLINE 2015-329

TITLE: (b) (6), (b) (7)(C) NAVAJO NATION TRIBE (THREAT)

CASE CLOSING REPORT

Subject(s)	Location	Other Data
(b) (6), (b) (7)(C)	Navajo Nation Tribe Shiprock, New Mexico	Navajo Nation (b) (6), (b) (7)(C)

VIOLATION(S):

18 U.S.C. § 111 (Assaulting, resisting, or impeding certain officers or employees)

ALLEGATION: On August 19, 2015, an investigation was initiated based on United States Environmental Protection Agency (EPA) Office of Inspector General Hotline Complaint #2015-329, wherein (b) (6), (b) (7)(C) of the Navajo Nation Tribe in Shiprock, New Mexico, may have threatened (b) (6), (b) (7)(C) Region 9, EPA, San Francisco, California, while (b) (6) was arranging for agricultural water delivery on the Navajo Nation land in response to the Gold King Mine incident.

FINDINGS: Two separate interviews of (b) (6), (b) (7)(C) an interview of a member of the Navajo Nation Division of Public Safety, and a review of statements provided by witnesses to the alleged threat were conducted. The investigation disclosed (b) (6) did not jump on the hood of the car being driven by (b) (6), but rather stood in front of (b) (6), (b) (7)(C) parked vehicle and used profane language in demanding (b) (6), (b) (7)(C) exit (b) (6) vehicle. During the discussion that ensued post (b) (6), (b) (7)(C) exiting (b) (6) vehicle, a truck containing three tribal members arrived at the scene. None of the individuals exited their vehicle nor did they make any sort of physical or verbal gestures toward (b) (6), (b) (7)(C). (b) (6), (b) (7)(C) explained (b) (6) did not feel threatened by (b) (6) during their verbal "altercation" but rather (b) (6), (b) (7)(C) felt threatened by (b) (6) the assumption that one of more of the men in the truck may have had a weapon

on their lap since they did not raise their hands to where (b) (6), (b) (7) could see. (b) (6), (b) (7) never saw an actual weapon.

A criminal history check of (b) (6) did reveal an outstanding warrant for (b) (6), (b) (7)(C) (b) (6). This information was provided to the Navajo Nation Division of Public Safety for action deemed appropriate.

DISPOSITION: On August 20, 2015, Resident Agent in Charge (b) (6), (b) (7)(C) telephonically briefed Assistant United States Attorney (AUSA) Paul Spiers, District of New Mexico, 520 Lomas Boulevard NW, Albuquerque, New Mexico, on this investigation. AUSA Spiers declined prosecution based on (b) (5), (b) (6), (b) (7)(C) (b) (7) (b)

The allegation that (b) (6) threatened (b) (6), (b) (7)(C) has been disproven. All potential criminal remedies have been addressed, and no further investigative activity is warranted. This case is closed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

DATE: AUGUST 1, 2015

PREPARED BY: (b) (6), (b) (7)(C)

CASE #: OI-HQ-2012-CAC-0126

CROSS REFERENCE #:

TITLE: ILLEGAL USE OF EPA INSIGNIA AND IMPERSONATING EPA SPECIAL AGENTS

CASE CLOSING REPORT

Subject(s)	Location	Other Data
Unknown	EPA HQ	

ALLEGATIONS: On June 5, 2012, the Office of Investigations (OI), Office of Inspector General (OIG), U.S. Environmental Protection Agency (EPA) received an anonymous tip that the EPA insignia was being used for illegal purposes. Specifically, the EPA insignia was being used on business cards to impersonate EPA Criminal Investigation Division (CID) Special Agents.

The potential violations include 18 United States Code (USC) 701, unauthorized use of official badges, identification cards and other insignia; and 18 USC 912, impersonation of an officer or employee of the United States.

FINDINGS: From November 21, 2013 through January 3, 2014 the Office of Professional Responsibility (OPR), OI, OIG, EPA conducted telephonic interviews of six companies that provided business cards to EPA CID Special Agents in order to determine whether any business cards were fraudulently procured. The companies are: Badges Etc; Chu graphics; Cobra Printing; Code 3 Products; Envision Printing and Shield Card America.

The Reporting Agent used the following methodology to determine whether any business cards of CID SAs were fraudulently procured:

- (b) (7)(E)
- (b) (7)(E)
- Based upon this review, the Reporting Agent was able to verify the identity of all but 26 CID SAs.
- The remaining 26 names were then verified against a list from the EPA Personnel Database.

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- 22 of the 26 CID SAs were identified on the EPA Personnel Database List
- As a result, four names needed to be verified.

The Reporting Agent verified the four missing names using the following methodology:

- SA (b) (6), (b) (7)(C) [REDACTED]
On April 24, 2014, contacted (b) (6), (b) (7)(C) [REDACTED] and verified through people plus records that SA (b) (6), [REDACTED] is currently employed at EPA.
- SA (b) (6), (b) (7)(C) [REDACTED]
On May 1, 2014, contacted (b) (6), (b) (7)(C) [REDACTED], Office of Counsel and Human Resources (OCHR), Office of General Counsel (OGC), (b) (6), (b) (7)(C) [REDACTED] and verified that SA (b) (6), (b) (7)(C) [REDACTED] is currently employed with the [REDACTED] and was previously employed with EPA.
- SA (b) (6), (b) (7)(C) [REDACTED] and SA (b) (6), (b) (7)(C) [REDACTED]
On June 2, 2014, contacted Badges Etc. and verified that SA (b) (6), (b) (7)(C) [REDACTED] and SA (b) (6), (b) (7)(C) [REDACTED] are currently employed with EPA.

On May 28, 2015, Special Agent (SA) (b) (6), (b) (7)(C) [REDACTED] Office of Investigations (OI), Office of Inspector General (OIG), U.S. Environmental Protection Agency (EPA) received an email from Chu Graphics containing business card transactions from 2011 to 2015. No anomalies were identified from the aforementioned business card request.

DISPOSITION: On August 1, 2015, OI, OIG, EPA determined that the foregoing allegation, based upon the facts provided was unfounded. As such, this case is being closed with no further action.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
TWO POTOMAC YARD
2733 SOUTH CRYSTAL DRIVE
ARLINGTON, VA 22202**

DATE: November 23, 2015

PREPARED BY: SA (b) (6), (b) (7)(C)

CASE #: OI-HQ-2014-CFR-0013

CROSS REFERENCE #: Hotline 2013-228

TITLE: BOOZ ALLEN HAMILTON, INC.

CASE CLOSING REPORT

Subject(s)	Location	Other Data
ASRC Management Services, Inc.,	6301 Ivy Lane, Suite 300, Greenbelt, MD 20770	Contact: (b) (6), (b) (7)(C)

VIOLATION(S): None

ALLEGATION: On July 25, 2013, (b) (6), (b) (7)(C), Booz Allen Hamilton, Inc. (BAH), 8283 Greensboro Drive, McLean, VA, 22101, (b) (6), (b) (7)(C), sent a letter to the U.S. Environmental Protection Agency (EPA), Office of Inspector General (OIG), Office of Investigations (OI) Hotline, self-disclosing that BAH inadvertently overcharged a total of \$43, 915.18 for labor hours on EPA contract #: EP-W-05-052, Task Order 100. (b) (6), (b) (7)(C) reported BAH discovered this error during their reconciliation process. According to (b) (6), (b) (7)(C) on May 2, 2013, BAH reimbursed the overpayment amount (\$43, 915.18) to the prime contractor ASRC Management Services, Inc. (ASRC).

Based on BAH's self-disclosure of inadvertent duplicate billing for labor hours, this office initiated a criminal investigation.

INVESTIGATIVE FINDINGS:

On March 26, 2015, the Case Agent conducted an interview with (b) (6), (b) (7)(C) EPA, Office of Acquisition Management (OAM), Washington, DC, Contact: (202) (b) (6), (b) (7)(C). According to (b) (6), (b) (7)(C) Contract #: EP-W-05-052, was Titled "Office of Site Remediation and Restoration, Records and Information Center". The contract was awarded September 28, 2007, and it was a fixed price contract. The estimated cost ceiling \$5,619, 294.96, Fixed Fee ceiling \$262, 505.39 and Total Cost Plus Fixed Fee \$5,881, 800.35. The period of performance was from January 1, 2008 to

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September 22, 2011. Prime contractor ASRC provided records management and library services.

According to (b) (6), (b) (7) on April 23, 2013, it appeared that ASRC gave the Agency an offset direct cost credit (ODCC) of \$43,915.18 applied to Task Order (TO) #100. However, the EPA Finance Center did not have any record of this ODCC. The Case Agent requested and was given copies of (1) EPA contract # EP-W-05-052, TO #100, (2) Excel spreadsheet, payment history for EPA contract # EP-W-05-052, TO #100, (3) Excel spreadsheet, EPA National Old 00801008-REVISED 2-25-15 and (4) Email Correspondence from EPA, OAM regarding TO #100.

On April 30, 2015, the Case Agent requested assistance from the OIG Office of Audit (OA), and provided copies of the aforementioned documents to OA. On June 3, 2015, OA returned a memorandum report that stated, ***"We reviewed the EPA's "Contract Invoice Cost Paid Inquiry" report for Contract No. EP-W-05-052, Delivery Order No. 100 and determined only one invoice was submitted by the prime contractor after February 8, 2012 on that Delivery Order. The subject ASRC Management Services invoice was prepared by the prime contractor on March 19, 2013, was received by the Agency on March 28, 2013, and paid on April 24, 2013. The subject invoice, in the amount of \$5,689.32, did not include the BAH credit invoice - only requesting a payment of fee. Consequently, there is no evidence in the EPA billing records to support payment of the BAH Credit invoice against Delivery Order 100"***.

On July 7, 2015, the Case Agent made contact with (b) (6), (b) (7)(C) ASRC Federal, 7000 Muirkirk Meadows Drive, Suite 100, Beltsville, MD 20705, Work: (301) (b) (6), (b) (7)(C), Cell (b) (6), (b) (7)(C), and requested a Release of Information for any documentation related to a refund payment made to the EPA in the amount of \$43,915.18, on or about April / May 2013. On July 17, 2015, the Case Agent received the requested documents from ASRC. However, ASRC's documents showed that the EPA owed their company (b) (6), (b) (7)(C) in unpaid / overdue invoices.

In addition according to ASRC, in October 2013, they intended to credit an invoice to the EPA. However, the TO in question had been closed since 2011 and there were no upcoming bills to issue a credit to, therefore ASRC applied the credit (\$43,915.18) to the entire contract #EP-W-05-052. According to ASRC, during this same timeframe, the Federal Government was experiencing a 16 day shutdown and when the shutdown ended, inadvertently ASRC took no further action on the matter.

On March 12, 2015, personnel from ASRC met with (b) (6), (b) (7) in (b) (6), (b) (7) EPA office to discuss unpaid / overdue invoices. According to (b) (6), (b) (7), during this meeting (b) (6), (b) (7) informed the ASRC representatives it would take time to review and corroborate their numbers and claims of unpaid and overdue invoices. (b) (6), (b) (7) recalled discussing General and Administrative (G & A) costs, getting the G & A corrected, and getting the invoices in the proper format for review. According to (b) (6), (b) (7), at no time did (b) (6), (b) (7) agree with ASRC's claims of past due / unpaid invoices. (b) (6), (b) (7) further stated at no time did ASRC inform her they applied the \$43,915.18 refund to the entire contract.

(b) (6), (b) (7) advised the Case Agent that ASRC is not breaking any rules by applying the refund to the entire contract. However the problem is, ASRC never informed (b) (6), (b) (7) or the Agency that a refund existed. According to (b) (6), (b) (7), in accordance with Federal Acquisition Regulation (FAR) 48 CFR 32.604, the contract officer (CO) can issue a demand letter upon learning of an overpayment, which (b) (6) as the CO intended to do.

On September 10, 2015, CO (b) (6), (b) (7) issued a demand for payment letter to ASRC in the amount of \$43, 915.18.

On October 12, 2015, the EPA, Finance office located in Research Triangle Park, NC, informed (b) (6), (b) (7) that the Agency received a final payment of \$43, 915.18 from prime contractor ASRC Management Services, Inc.

SUMMARY:

This investigation did not uncover any evidence of criminal activity nor did it reveal any evidence of additional overbilling. The investigation did reveal that the EPA had not been credited with the amount of self-disclosed over payment which was subsequently rectified. Because of this, it is believed that continued investigation would not be in the best interests of the government. As such, no further investigative activity is anticipated. This investigation is closed in this office.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY OFFICE OF INSPECTOR GENERAL

DATE: August 16, 2016

PREPARED BY: SA (b) (6), (b) (7)(C)

CASE #: OI-AR-2013-ADM-0110

CROSS REFERENCE #:

TITLE: ENVIRONMENTAL PROTECTION AGENCY OFFICE OF HOMELAND
SECURITY

CASE CLOSING REPORT

This case closing report sets forth the work conducted by the Environmental Protection Agency (EPA) Office of Inspector General (OIG) Office of Investigation (OI), to determine what authority, if any, the Office of Homeland Security (OHS) have to issue non-disclosure agreements (NDAs). The EPA OIG OI initiated an investigation to determine if the use of these the NDAs by EPA OHS violated the Whistleblower Protection Enhancement Act of 2012 (WPEA).

During the course on an investigation, the EPA OIG OI discovered EPA OHS issued NDAs to EPA employees. As a result of the investigation, the EPA OIG OI obtained two, unsigned, NDAs believed to be used by EPA OHS.

During the week of June 16, 2014, EPA OIG OI presented a complaint to the Office of Special Counsel, regarding the alleged inappropriate use of NDAs within EPA OHS.

On June 5, 2015, Office of Special Counsel, Attorney (b) (6), (b) (7)(C) emailed EPA OIG OI with the Policy/Procedure change to OHS' NDA process.

Since no addition investigation by EPA OIG OI is contemplated, the instant case is being closed at this time via this final summary report.